

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually, and)
On behalf of a Class of persons)
similarly Situated,)
Plaintiff,)
vs.) Civil Action No.:
) 4:21-CV-40-TWT
)
3M COMPANY, DAIKIN)
AMERICA, INC., HUNTSMAN)
INTERNATIONAL LLC, MOUNT)
VERNON MILLS, INC., TOWN OF)
TRION, GEORGIA, and RYAN)
DEJUAN JARRETT,)
)
Defendants.)

**RYAN DEJUAN JARRETT'S MOTION TO DISMISS CLAIMS
AGAINST HIM IN THE AMENDED COMPLAINT**

Defendant Ryan Dejuan Jarrett (“Defendant Jarrett”) respectfully moves the Court to dismiss Plaintiff’s Amended Complaint under Federal Rules of Civil Procedure 8(a) and 12(b)(6). As explained in Defendant Jarrett’s brief in support of this motion to dismiss, Plaintiff’s Amended Complaint fails to allege plausible facts to support a legally-cognizable claim for relief against Defendant Jarrett, and the Amended Complaint otherwise fails to state a claim against him upon which relief may be granted.

WHEREFORE, Defendant Jarrett respectfully moves the Court grant this motion and enter an order dismissing the claims against him in the Amended Complaint with prejudice.

Respectfully submitted this 13th day of May, 2021.

/s/ Craig Pendergrast

Craig Pendergrast, GA Bar. No. 571155
Taylor English Duma LLP
1600 Parkwood Circle NW, Suite 200
Atlanta, GA 30339
Email: cpendergrast@taylorenglish.com

Counsel for Defendant Ryan Dejuan Jarrett

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually, and)
On behalf of a Class of persons)
similarly Situated,)
Plaintiff,)
vs.)
3M COMPANY, DAIKIN)
AMERICA, INC., HUNTSMAN)
INTERNATIONAL LLC, MOUNT)
VERNON MILLS, INC., TOWN OF)
TRION, GEORGIA, and RYAN)
DEJUAN JARRETT,)
Defendants.)

Civil Action No.:
4:21-CV-40-TWT

CERTIFICATE OF SERVICE
AND COMPLIANCE WITH LOCAL RULE 5.1

I hereby certify that I have this date electronically filed this motion, which has been prepared using 14-point Times New Roman font, using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Dated: May 13, 2021.

/s/ Craig Pendergrast
Craig Pendergrast, GA Bar. No. 571155
Taylor English Duma LLP
1600 Parkwood Circle NW, Suite 200
Atlanta, GA 30339
Email: cpendergrast@taylorenglish.com